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Karla Del Pozo García Associate

karla.delpozogarcia@dentons.com D +1 212-768-5328 Dentons US LLP 1221 Avenue of the Americas New York, NY 10020-1089 United States

dentons.com

September 24, 2021

VIA ECF

The Honorable Debra C. Freeman United States Magistrate Judge Southern District of New York 40 Foley Square New York, New York 10007

Re: Davis v. Silver Fern Farms USA LLC: Case No. 1:21-cv-04750-ALC

Dear Judge Freeman,

We represent defendant Silver Fern Farms USA LLC ("Defendant") in the above-referenced matter. Together with counsel for plaintiff, we jointly and respectfully move this Court to stay all case deadlines in this action for forty five (45) days, from September 24, 2021 to November 8, 2021.

This requested stay will permit the parties to finalize their efforts to bring about the voluntary dismissal of all claims asserted in this action without further litigation. Once those efforts are complete, voluntary dismissal will be filed.

Respectfully submitted,

<u>/s/ Karla Del Pozo García</u> Karla Del Pozo García

cc: All counsel of record (by ECF)

The requested stay of discovery is granted. The parties are directed to update the Court no later than 10/22/2021 regarding the progress of their settlement efforts.

SO ORDERED

DEBRA FREEMAN

United States Magistrate Judge

Dated: 9/24/2021